

Bennett, Giuliano, McDonnell & Perrone, LLP
494 Eighth Avenue, 7th Floor New York, New York 10122
Telephone: (646) 328-0120 Facsimile: (646) 328-0121

MEMO ENDORSED

December 22, 2007

By facsimile (212) 805-7948

URGENT

Honorable Richard J. Howell
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>12/26/07</u>

**Re: Sinoriches Global Limited v. New Ocean Shipping Co., Ltd.
1:07-cv-05779-RJH**

Dear Judge Howell:

We represent the plaintiff Sinoriches Global Limited who commenced the instant Rule B attachment by the filing of a Complaint on June 18, 2007. On October 17, 2007 Ms. Lilian Philiposian, Esq., of the firm of Rawle & Henderson, LLP, on behalf of JPMorgan an intermediary bank served with a Rule B writ of attachment, advised the undersigned that funds were being wire transferred through JP Morgan Chase in the amounts of \$10,000.00 and \$3,853.00 from "New Ocean International Shipping Co. Ltd." Those funds were attached at our direction.

On Friday, December 21, 2007 Carl Buckholz, Esq. of the firm of Rawle & Henderson contacted the undersigned and advised that JP Morgan was being threatened by its customer who advised that if the funds were not released the customer would take its business away from JP Morgan. The attachment had been in place for over two months and New Ocean International Shipping has made no appearance or request that this Court vacate the attachment despite their right to an expedited hearing per Rule E of the supplemental maritime rules.

By email dated Friday, December 21, 2007, sent at 3:30 p.m., Mr. Kevin McGee, Esq. of Rawle & Henderson wrote: "On behalf of JP Morgan Chase, we request that you set forth in writing the factual basis as to why plaintiff asserts that the funds under restraint in this matter belonging to "New Ocean International Shipping Co. Limited" are subject to the Writ issued in the matter of Sinoriches Global Limited v. New Ocean Shipping Co., Ltd., et al. - SDNY 07-CV-5779. This issue has developed into a major

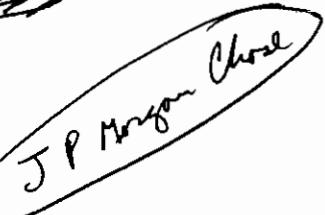
issue effecting the Bank, we must have your reply by no later than Noon on Monday, December 24, 2007 or the funds will be subject to release."

Because of the Christmas holiday I requested additional time to respond to Rawle & Henderson's "11th hour demand" that I respond to their ultimatum by noon on Christmas Eve. Mr. Buckholz refused my request by email dated Saturday, December 22, 2007. As a result of Mr. Buckholz's refusal to grant me an extension of time, I am forced to respectfully request that your Honor issue an Order directing JPMorgan Chase to continue its restraint of the funds of New Ocean International Shipping until Plaintiff has be afforded adequate time to respond to the request of Rawle & Henderson, LLP. We expect to be able to respond more fully to their request in three weeks.

Very truly yours,



William R. Bennett, III



cc:

Rawle & Henderson, LLP
The Widener Building
One South Penn Square
Philadelphia, PA 19107
215-575-4431 - Phone
215-563-2583 - Fax

If funds have been
attached by J.P. Morgan Chase
pursuant to a lawful writ
of attachment, then the facts at
its peril in releasing funds.
If ~~it has~~ funds have not been
attached or a writ or order have
not issued, then the letter of December
22 provides an inadequate basis for
for an Order directing J.P. Morgan
to continue its restraint of the
funds.

ORDERED,



J. S. Bork

12/26/07
Part I